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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIS, INC. PASSENGER SEXUAL ASSAULT LITIGATION This Document Relates to: ALL ACTIONS	Case No. 3:23-md-03084-CRB **DECLARATION OF S. LONDON IN SUPPORT OF PLAINTIFFS' ADMINISTRATIVE MOTION TO SHORTEN TIME FOR UBER'S RESPONSE TO MOTION TO ENFORCE PTO NO. 5 RELATED TO GOVERNMENT INVESTIGATION DOCUMENTS**

1   I, Sarah London, hereby declare under penalty of perjury:

2   1.   I am a partner at Lieff Cabraser LLP, am admitted to practice in the Northern

3   District of California, and serve as Co-Lead and Liaison Counsel in this matter. I submit this

4   declaration in support of Plaintiffs' Motion to Shorten Time For Defendant Uber's Response to

5   Plaintiffs' Motion to Enforce PTO No. 5 Related to Government Investigation Documents.

6   2.   The parties were unable to stipulate to a briefing schedule regarding Plaintiffs'

7   motion to enforce. Uber proposed filing a response on February 23, 2024, with a hearing date

8   shortly thereafter, noting that Uber's productions are continuing, and that more documents will be

9   produced this week. Plaintiffs submit that such a schedule is inefficient, given the already-

10   calendared discovery hearing on February 22, 2024.

11   3.   Absent expedited resolution of Plaintiffs' motion, Plaintiffs will be substantially

12   prejudiced because they will go weeks more without access to court-mandated discovery, overdue

13   as of January 31, 2024.

14   4.   The nature of the parties' dispute is accurately set forth in Plaintiffs' motion to

15   enforce.

16   5.   The parties have agreed to depart from the ordinary timelines set out in the Local

17   Rules as agreed or ordered by the Court.

18   6.   Expedited briefing on this discrete issue would not impact any other deadlines in the

19   case.

20   I declare under penalty of perjury under the laws of the United States of America that the

21   foregoing is true and correct.

22   Executed this 12th day of February, 2024, at Austin, Texas.

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24   /s/ Sarah London
25   Sarah London

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